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**Core Strategy Development Plan Document**  
**Regulation 20 of the Town & Country (Local Development) (England) Regulations 2012.**  
**Publication Draft - Representation Form**

**PART A: PERSONAL DETAILS**

*\* If an agent is appointed, please complete only the Title, Name and Organisation in box 1 below but complete the full contact details of the agent in box 2.*

	1. YOUR DETAILS*	2. AGENT DETAILS (if applicable)
Title	Mr & Mrs	
First Name	[REDACTED]	
Last Name	LUND	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3	Ilkley	
Line 4		
Post Code	LS29 [REDACTED]	
Telephone Number	[REDACTED]	
Email Address	[REDACTED]	
Signature:	[REDACTED]	Date: 28 <sup>th</sup> March 2014

**Personal Details & Data Protection Act 1998**

Regulation 22 of the Town & Country Planning (Local Development) (England) Regulations 2012 requires all representations received to be submitted to the Secretary of State. By completing this form you are giving your consent to the processing of personal data by the City of Bradford Metropolitan District Council and that any information received by the Council, including personal data may be put into the public domain, including on the Council's website. From the details above for you and your agent (if applicable) the Council will only publish your title, last name, organisation (if relevant) and town name or post code district. Please note that the Council cannot accept any anonymous comments.

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**PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.**

**3. To which part of the Plan does this representation relate?**

Section	<div style="border: 1px solid black; padding: 2px;">                 3 4.3 5.3 5.4             </div>	Paragraph	<div style="border: 1px solid black; padding: 2px;">                 Multiple             </div>	Policy	<div style="border: 1px solid black; padding: 2px;">                 SC7 WD1 HO2 /HO3/ HO6 EN4             </div>
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**4. Do you consider the Plan is:**

4 (1). Legally compliant	Yes	<div style="border: 1px solid black; padding: 2px; text-align: center;">✓</div>	No	<div style="border: 1px solid black; padding: 2px;"></div>
4 (2). Sound	Yes	<div style="border: 1px solid black; padding: 2px;"></div>	No	<div style="border: 1px solid black; padding: 2px; text-align: center;">✓</div>
4 (3). Complies with the Duty to co-operate	Yes	<div style="border: 1px solid black; padding: 2px; text-align: center;">✓</div>	No	<div style="border: 1px solid black; padding: 2px;"></div>

**5. Please give details of why you consider the Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please refer to the guidance note and be as precise as possible. If you wish to support the legal compliance, soundness of the Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

We consider that the provision of 800 new housing units in the Ilkley ward is inappropriate for the reasons set out below, and that accordingly the plan is unsound. We believe it can be made sound if modified along the lines set out in section B6 of this representation.

## The local market.

We contend that the housing market in the Ilkley ward is distinct from the Bradford District housing market. Ilkley is a small dormitory town in a semi-rural setting on the northern extremity of the District. Its property prices, demographics, employment provision, population growth, commuting patterns and migration characteristics are very different from those in the urban areas of the District, and its existing housing stock and future housing needs reflect these differences. In randomly prescribing 800 units for the Ilkley ward, the Council has failed to consider and reflect these differences.

The majority of developable sites so far identified in Ilkley involve green belt release, and / or greenfield areas. Reference to the latest SHLAA shows that previously developed land provides for only 36% of the proposed 800 units. Developers will not build low value units on expensive green belt / greenfield land. Accordingly the suggested scale of development in Ilkley will make a negligible contribution to Bradford's predominant housing need given the chasm between the District median value of £119,725 and the Wharfedale (which includes Ilkley) median value of >£180,000. (Source: Bradford SHMA 2013 update)

Ilkley's housing needs have for many years been largely satisfied by windfall which has resulted in several hundred permissions over the last ten years many of which have not been built. Windfall can continue to satisfy a significant proportion of the local need going forward.

## Sustainability

We contend that development on the scale proposed is unsustainable in that Ilkley's essential infrastructure is not meeting the needs of the present population, let alone any increase. Major investment in roads, public transport, parking provision, schools and healthcare is required to correct the situation but the Local Infrastructure Plan dated October 2013 makes no robust provision for any such investment. In any event, the land which would be required for new infrastructure is now included in the SHLAA for housing, and physical constraints would rule out a major road scheme.

The term "sustainable location(s)" is liberally used throughout the Publication Draft. We contend that no location in a settlement where the infrastructure is already inadequate can be sustainable. We note the Planning Minister's Parliamentary Statement of 6<sup>th</sup> March 2014 that Government are "ensuring that infrastructure is provided to support new development, and noting how infrastructure constraints should be considered when assessing suitability of sites". We see no evidence that Bradford Council intend to comply with this policy.

The absence of a commitment to invest in essential infrastructure renders any housing development unsustainable.

## Green Belt Release

Analysis of the most recent SHLAA for the Ilkley ward discloses that at least 55% of the proposed housing units would involve green belt release. This compares with only 25% of the District's requirement being met from green belt land take, yet the green belt around Ilkley has arguably the highest landscape value of the District. This imbalance reflects a totally inadequate consideration of Policy EN4 – Landscape which embodies the matters set out in the Landscape Character SPD – Volume 8: Wharfedale from which the following extracts have been taken. We have emboldened the passages which are especially relevant:

- *The A65 trunk road is the key transport link through Wharfedale connecting the major settlements of Menston, Burley in Wharfedale, Ilkley and Addingham. **It is a very busy route running along the valley floor carrying upwards of 20,000 vehicles a day.** This consists of commuter traffic to and from Ilkley to Leeds and Bradford, and tourist traffic to the Yorkshire Dales, the Lake District and beyond. Although by-passes at Addingham and Burley have eased traffic congestion, **bottlenecks at Ilkley and Menston still have a negative impact on their town's character.***
- ***The Wharfe Valley has distinctive identity** within the district created primarily by landform supported by a well wooded landscape and **settlements with distinct edges and separate identities.***
- *The landscape types within this narrow valley have a balanced appearance and dense tree cover absorbs the volume of settlement. **Of particular importance is the integrity of the existing***

*settlements and that they retain their identity.*

- ***The strongly wooded character of Wharfedale should be conserved and protected against further development which would fragment the woodland canopy within the wooded incline, in particular, but also throughout the character area. Opportunities should also be sought, where possible, to encourage regeneration and planting, in order to ensure the long term continuity of the wooded character.***
- ***Opportunities for new development in Wharfedale are limited by the need to preserve the sharp edges of the existing settlements. The retention of the separate identity of the existing towns and villages through physical separation should be a long term aim. Additional woodland planting around the settlements will help to contain new development. Any new proposals in Wharfedale should also be assessed for their impact on the busy road network along the valley and across the valley slopes towards Airedale, to avoid adversely affecting the attractive quality of life of both residents and visitors.***
- ***It is important to prevent the spread of development which would destroy the identity of the settlements of Menston, Burley in Wharfedale and Ilkley. Keep settlement edges neat and discreet and utilise a framework of tree planting.***
- ***With strong character, medium historic continuity and prominent and enclosed landscape, this area is sensitive to development. However, there is continuing pressure for small scale residential development of individual or small numbers of dwellings within these well-wooded areas, especially within the grounds of large houses on the wooded valley slopes. Although these can be sometimes be accommodated within the woodland canopy, there is a danger that the accumulative effect of these developments will substantially deplete the long term tree cover of this landscape type and should be resisted. Furthermore, in most instances, these developments would destroy ground flora of biodiversity value and the habitats of some wildlife species. This policy guideline could also be applied to the well-wooded areas of the settlement of Ilkley.***

The Council have yet to publish the Allocations DPD and accordingly there is no information at this time about which of the SHLAA green belt sites will be proposed for release. As an aside, we feel that the absence of the Allocations DPD at this critical time is regrettable. In any event, we contend that the release of any of the possible green belt sites would conflict with the aims and recommendations of the Landscape Character SPD as typified by the extracts quoted above, and would thus be in conflict with Policy EN4.

We are pleased to note that the Landscape Character SPD makes several references to the need to prevent the merger of nearby settlements. The Council are, therefore, compliant in this respect with paragraph 80 of the NPPF which sets out five purposes of established green belt. However, in then seeking to release green belt for development, they come into conflict with those purposes and with their own Policy EN4. Furthermore, they contravene the NPPF requirement that green belt boundaries may be redrawn only in exceptional circumstances as defined of which none are present. Recent Ministerial clarification has affirmed that unmet housing need is not an exceptional circumstance to justify green belt deletion.

Our understanding of current official guidance on the interpretation of the NPPF green belt provisions is that it is for Local Planning Authorities to determine whether or not to release green belt land. Bradford Council have indicated they must do so as they cannot identify an adequate supply of deliverable and viable previously developed land, or failing that, of greenfield sites. We contend that the Council have not exercised due care in reaching that conclusion and have taken an unduly rigid view of deliverability and viability. We believe that the supply of viable previously developed land in the District is adequate to avoid the release of the more sensitive green belt areas at the very least, and that none of the green belt in Ilkley, or indeed in Wharfedale, should be allocated for development.

Finally, we wish to draw attention to specific features of the green belt of the Ilkley ward which strengthen the case for the preservation of its existing strong boundary:

- Ilkley is an elongated settlement surrounded by established green belt.
- It is approximately 4km in length and is sandwiched between the inviolable areas of the South Pennine Moors SPA/SAC (Ilkley Moor) to the south, and the Nidderdale AONB to the north.
- Any green belt releases would, therefore, have to be on the eastern or western boundaries of the settlement. These edges are relatively narrow (each 1.1km approx.) and their development would, therefore, result in a disproportionate further elongation of the settlement which, at least on the eastern edge, would produce ribbon development.
- The Habitats Regulations which cover the SPA/SAC provide for a zone of influence of up to 2.5km beyond the regulated area to protect wildlife habitats. The whole of the Ilkley ward falls within that zone. The influences on habitats have yet to be determined and it is, therefore, premature to consider the release of undeveloped land for housing.
- Ilkley Moor is an iconic landscape of world renown. It attracts tourists from far and wide. The view of



the moor from the town and surrounding areas is of great value, as is the aspect from the moor up and down Wharfedale, and of Ilkley itself. Any release of green belt for development will cause irreparable damage to those vistas.

6. **Please set out what modification(s) you consider necessary to make the Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to the soundness. (N.B Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).**

**You will need to say why this modification will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

We believe the required scale of development for the District can be achieved by revisiting and reworking the availability of previously developed land with a more rigorous approach to the issues of deliverability and viability. Greenfield sites should also be reviewed and if any remaining shortfall necessitates release of green belt this should be approached with much greater attention to the Council's Landscape Character SPD and to the provisions of the NPPF in relation to green belt.

We believe that this exercise will obviate the need for green belt releases both in the Ilkley ward and in Wharfedale as a whole, and reduce the need for green belt take elsewhere in the District.

We, therefore, propose that the Plan be modified as follows:

The allocation for Ilkley should be reduced to 400 units. This can be achieved without the use of greenfield / green belt land by including windfall sites and unimplemented permissions.

Since even this reduced number is unsustainable without investment in infrastructure, the Plan must robustly provide for that investment to be made ahead of housing development.

All reference to green belt release in Ilkley ward should be removed.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. Please be as precise as possible.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**7. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination?**



No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

**8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

\* Although I am not asking to participate, I am happy to do so should the Inspector consider it appropriate

**Please note** the Inspector will determine the most appropriate procedure to adopt when considering to hear those who have indicated that they wish to participate at the oral part of the examination.

**9. Signature:**

**Date:**

28<sup>th</sup> March 2014

**Core Strategy Development Plan Document (DPD) : Publication Draft**

**PART C: EQUALITY AND DIVERSITY MONITORING FORM**





